

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JUUL LABS, INC.,

Plaintiff,

v.

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

Civil Action No. 1:19-cv-00715-LO-IDD

PLAINTIFF’S REQUEST FOR CLERK’S ENTRY OF DEFAULT

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff Juul Labs, Inc. (“Plaintiff”), by counsel, respectfully requests that the Clerk of the Court enter default against The Unincorporated Associations Identified in Schedule A (“Defendants”). In support of this request, Plaintiff states as follows:

1. On June 4, 2019, Plaintiff filed its Verified Complaint (“Complaint”) against Defendants. *See* D.I. 1.

2. Upon Plaintiff’s information and belief, Defendants are individuals and business entities who conduct business throughout the United States, including within the State of Virginia and this Judicial District, through the operation of online marketplaces, such as eBay. Each Defendant targets the United States, including Virginia, and has offered to sell and, on information and belief, has sold and continues to sell Counterfeit JLI Pods to consumers within the United States, including the State of Virginia and this District. *See id.* ¶ 20.

3. On July 23, 2019, Plaintiff filed a Motion for Service of Process by Email, whereby Plaintiff moved the Court for leave to effect substituted service on certain foreign Defendants located in China. *See* D.I. 47. On July 24, 2019, the Court granted Plaintiff's Motion and ordered Plaintiff to provide notice to the certain foreign Defendants located in China by serving a copy of the Order on Defendants via the e-mail addresses associated with the various eBay accounts. *See* D.I. 54.

4. On June 25, 2019, the Clerk of the Court issued Plaintiffs' Proposed Summonses as to certain Defendants having ascertainable addresses within the United States (*see* D.I. 56) and as to the certain foreign Defendants located in China (*see* D.I. 55).

5. On July 31, 2019, Plaintiff initiated service on the Defendants located within the United States. On October 21, 2019, Plaintiff filed proof of service affidavits as required by Fed. R. Civ. P. 4(l)(1). *See* D.I. 81-126; *see also* Talley Declaration ("Talley Decl.") ¶ 4.

6. On July 31, 2019, Plaintiff served certain foreign Defendants located in China by electronic mail via the email addresses associated with the Defendants. *See* Talley Decl. ¶ 5. On October 21, 2019, Plaintiff filed a Notice of Service of Defendants by Email as required by Fed. R. Civ. P. 4(l)(2). *See* D.I. 128; *see also* Talley Decl. ¶ 6.

7. Plaintiff filed Notices of Agreed Stipulated Dismissal with Prejudice on September 4, 2019 (D.I. 76) and October 21, 2019 (D.I. 127) against the following Defendants as numbered in Schedule A:

No.	Defendant Name	Seller ID/Defendant Store	Defendant Email
1	Yaser Ahmed	yaserjajan	yaseraldagstane@yahoo.com yjajan@yahoo.com noordeek@gmail.com
11	Kevin Sullivan	dre_sull	wayofthebros@gmail.com
13	Russell McGowan	awakeandsell	6AMwholesale@gmail.com dually225@gmail.com

No.	Defendant Name	Seller ID/Defendant Store	Defendant Email
14	Zhenyu Zhu	plehnevi17	fujitou1996@gmail.com songweitou1996@gmail.com songweitou2012@gmail.com songweitou2013@gmail.com zyztech1688@gmail.com songweitou1012@gmail.com zyztech168@gmail.com
47		walou-19	dianshiji2013@gmail.com huoyan98@gmail.com hymz888@yahoo.com.cn zhenyu79@gmail.com zhenyu79@juno.com zhenyu@attbi.com zhenyuzhu8@hotmail.com
28	Dennis Hammer	metroimporting	den.hammer@gmail.com hello@dennishammer.com
32	Kenneth Buss	highdesity	SWE2@HOME.COM swe2@cox.net
35	April Casella	downeastmed41	downeastmedicinals04240@gmail.com
37	Tracy Wisby	hotrendz	tcwisby@yahoo.com
41	Nicole Egdorf	trisyeeegdor_0	tristen.egdorf@outlook.com
46	Sarah Griffith	sagrif-66	s.griffith81@yahoo.com
52	Slade Hanson	slhan_40	hansonslade1@gmail.com
57	Jesse Lazar	jesla-370	christopherbowling2019@yahoo.com jasminevale2021@gmail.com jasonlazar2015@gmail.com jesselazar2019@yahoo.com jesselazar2021@gmail.com normadominguez2021@gmail.com jaisonzaia@gmail.com johnzain2020@gmail.com Joseph.lazar89@yahoo.com
62	Jason Kim	oofzcuky2	kimjason1288@gmail.com hosuk12@gmail.com cukykim2@gmail.com cukykim@gmail.com oofzcuky@gmail.com
64	Yan Xiong	snapoom_01	snapoom01@gmail.com
75	Kimberly Stratos	sambrosia08	kimberlystratos@yahoo.com

8. Plaintiff filed a Notice of Dismissal under Rule 4(m) dismissing this action without prejudice on August 22, 2019 (D.I. 60) against the following Defendants as numbered in Schedule A:

No.	Defendant Name	Seller ID/Defendant Store	Defendant Email
9	Arthur Bernard	iguel2_86	Carolyn.Vaughae458@gmail.com iguel247ppayn@gmail.com

9. Remaining Defendants did not file an answer within 21 days of the service of the Complaint and Summonses as required by Fed. R. Civ. P. 12(a). *See* Talley Decl. ¶ 7.

WHEREFORE, for the reasons set forth above, Juul Labs, Inc. respectfully requests that the Clerk enter default against the remaining Defendants as to all claims asserted by Plaintiff:

No.	Defendant Name	Seller ID/ Defendant Store	Defendant Email
2	Greg Hillhouse	ghilly001	doubleh911@hotmail.com
3	Panteley Nikolov	pant-20	pantelein@gmail.com
4	敏 张 (Min Zhang)	qiaotianping-zhengmeixinxi	qtp_misszhang@outlook.com shiyan0227@outlook.com qtp_misszhang@hotmail.com
5	Frederick Roesel	miss_zhang	qtp_misszhang@outlook.com shiyan0227@outlook.com qtp_misszhang@hotmail.com
6	Daniel White	reenpate-10	danielwhite2484@msn.com leer25@yahoo.com reenapatel548@yahoo.com
7	Wenjiang Mai	vapingpit	maiwenjiang@hotmail.com misszhanglink2mwj@outlook.com qtplink2mwj@outlook.com
8	东东 王 (Dong Dong Wang)	savings4u168	wangpaul668@gmail.com
10	Mark Derias	lulucaty5171	markd@adventresources.com marksafwat@hotmail.com
38		2015.filta	mderias@scottrobinson.com marksafwat@yahoo.com
12	Antonio Cressotti	a.cressotti69	a.Cressotti88@gmail.com
15	莲翠 蒋 (Lian Cui Jiang)	kytech2016_0	kytech2016@163.com
16	小华 汪 (Xiao Hua Wang)	szeminhhangy	wangxiaohua588@outlook.com
17	Roy Walker	sodal-87	sodalohapo@gmail.com
18	Yervand Setoyan	yervansetoya	yervandsetoyan@icloud.com
20		yervansetoya-0	
19	Greg Wilson	grwilson_44	jockgadjo@gmail.com Grwilson889_1@gmail.com
21	Antonio Cressotti	cress.anton	xxweasel102xx@gmail.com

No.	Defendant Name	Seller ID/ Defendant Store	Defendant Email
22	小华 汪 (Xiao Hua Wang)	tyijiafkju	xiaohuawang588@outlook.com
23	Eman Ghaly	zbest4less2012	sawaf75@yahoo.com
24	海艳 项 (Hai Yan Xiang)	red-cherry2018	cherry-xiang@outlook.com
25	Jordan Horst	jdonymous	jordanhorst29@gmail.com
26	Myron Doyle	myrodoyl0	pipelinerintexas@gmail.com
27	Benz Tran	betr-2	deezdeezllc@gmail.com
29	JiaQi Chen	keepvap1ng	chenkaki2018@hotmail.com
30	Duy Tran	ageless911	versace1910@yahoo.com
31	Angelene Quimbaya	quimstores_914	angquimbaya27@gmail.com
33	鹏 林 (Peng Lin)	talfangkoyu	penglin188@outlook.com
34	Ivan Zambarov	ivanbgatlanta	zambarovivan@gmail.com
36	Nikolay Zanbarov	nikobg1973	zmbvr@yahoo.com
39	Mervat Aboulayla	jafra1571	jamesfranco12h@gmail.com
40	Noah Martano	noamartan_0	noahlasalle33@gmail.com
42	Josif Leitner	golit_34	yossileit@gmail.com
43	Harlen Nappi	harna_1763	harlennappi@gmail.com
44	Robert Rule	ruleimports	store@botanicalboulevard.com
45	MingHua Huang	wii_store	czzbackup@outlook.com huangminghua1024@hotmail.com wmwbackup@outlook.com
48	Jacob Coleman	stealt_80	washington.uribe@outlook.com jlcoleman562@outlook.com
50	Alejandro Piedra	alejandrpiedr1	ale_piedra1@gmail.com ale_piedra1@hotmail.com
51	Christy Vasquez	joose-6877	cvasquez727@hotmail.com
53	辉棋 林 (Hui Qi Lin)	wanyancai559	linhq888@hotmail.com
54	Wenbo Lei	wenwen996_4	wenwen996@aliyun.com
55	Marcio Diaz	lostandfoundnyc	liljuulpod@outlook.com MarcioADiaz@outlook.com misterjuul1@gmail.com
59	Nidal Hamayel	nidahamaye-0	nidal20095111@gmail.com
60	Imad Rihan	emadors15	emadors@yahoo.com
61	Zahey Sameeh	limeri-26	zahi.darawsheh@gmail.com
63	Frederick Roesel	hfbnvt_76	hfbnvtvj7824@gmail.com
65	Bobby Taylor	aggence9802	aggence980@gmail.com
66	Carol Prine	capr-99	carolprine2015@gmail.com
68	小华 汪 (Xiao Hua Wang)	yanshifu482	wxhual88@outlook.com

No.	Defendant Name	Seller ID/ Defendant Store	Defendant Email
69	Jiawei Huang	rickyh-00	a576004478@gmail.com
70	Dario Vasquez	vasmi	Vasmi72@gmail.com
71	Kengate Leen	bigd9006	shu824334@yeah.net
72	Jordan Mcleod	bigapplewares	kirby8456@gmail.com
74	Kyle Patterson	richpattersonkyle	cheapviralmoney@gmail.com kylepatt02@gmail.com wholesalejuulvendor@gmail.com cassandrainlove1985@yahoo.com kmakincash@aim.com Sandrainlove1985@yahoo.com

Date: November 22, 2019

Respectfully submitted,

/s/ Monica Riva Talley

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